

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	
)	
Petition For Waiver of Section 20.18(c))	FCC 00-436
of the Commission's Rules and the)	
Deadlines Established in the)	
Fourth Report and Order)	

REPLY COMMENTS OF ACS WIRELESS, INC.

ACS Wireless, Inc. ("ACSW") hereby submits Reply Comments in the above captioned matter. ACSW supports the waiver requests of Enterprise Wireless PCS, LLC, Missouri RSA No. 7, Public Service Cellular, Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership, and Illinois Valley Cellular RSA 2-III Partnership (hereinafter collectively referred to as "Petitioners"). Like Petitioners, ACSW is a small rural wireless carrier. ACSW operates a Time Division Multiple Access (TDMA) network. ACSW recognizes the difficulties for small and rural carriers associated with purchasing and deploying the software and equipment required to make TDMA systems, in particular, capable of transmitting 911 calls from TTY devices. Further, ACSW has encountered the same types of obstacles Petitioners have described in its efforts to comply with 47 C.F.R. § 20.18(c). For these reasons, ACSW supports Petitioners' waiver requests and has filed, contemporaneously with these Reply Comments, its own request for a waiver of 47 C.F.R. § 20.18(c).

Respectfully submitted on this 18th day of April 2002.

ACS Wireless, Inc.

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